# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

# BILL OF INFORMATION FOR MATERIAL FALSE STATEMENTS TO THE UNITED STATES

UNITED STATES OF AMERICA \* CRIMINAL NO.

v. \* SECTION:

JOSEPH RECASNER \* VIOLATION: 18 USC § 1001

\* \* \*

The United States Attorney charges that:

## Count 1

### A. AT ALL TIMES MATERIAL HEREIN:

- 1. The United States Department of Housing and Urban Development (HUD) is an agency of the United States of America.
- 2. HUD provides funds through the Community Development and Block Grant (CDBG) Disaster Recovery Assistance Program to assist victims of Hurricane Katrina.
- 3. Hurricane Katrina struck southeastern Louisiana on or about August 29, 2005.

4. The CDBG Disaster Recovery Assistance program in connection with Hurricane Katrina was administered through the Louisiana Road Home Program (LRHP).

### B. THE FALSE STATEMENT:

On or about September 29, 2006, in the Eastern District of Louisiana, the defendant, JOSEPH RECASNER, did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact in a matter within the jurisdiction of the United States Department of Housing and Urban Development, an agency of the United States, in that he filed an application with the Louisiana Road Home Program (LRHP) receiving a CDBG totalling \$87,424.11 in disaster recovery assistance. As a result of this, JOSEPH RECASNER, falsely and fraudulently stated in his application to the LRHP that his primary residence on August 29, 2005 was 1422 Reynes Street, New Orleans, Louisiana,

when in truth and fact, as the defendant **JOSEPH RECASNER** well knew his primary residence was 2511 Saint Nick Drive, New Orleans, Louisiana; all in violation of Title 18, United States Code, Section 1001.

JIM LETTEN
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New Orleans, Louisiana September 30, 2009